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Proposed Attorneys for Debtor-In-Possession

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re
Hidden Glen, LLC,

Debtor.

Case No. 20-41767 CN

Chapter 11

**DECLARATION OF CHRIS D.
KUHNER IN SUPPORT OF
APPLICATION FOR
EMPLOYMENT OF COUNSEL
FOR CHAPTER 11 DEBTOR AND
DEBTOR-IN-POSSESSION**

I, Chris D. Kuhner, declare under penalty of perjury as follows:

1. I am an attorney at law, duly admitted to practice in the State of California and in this Court.

2. I practice law under the firm name of Kornfield, Nyberg, Bendes, Kuhner & Little, P.C. The firm maintains offices for the practice of law at 1970 Broadway, Suite 600, Oakland, California. I am duly admitted to practice in this State and before this Court, as are all the other members of the firm.

3. Other than as is disclosed in the Debtor's Application for Employment of Counsel for Debtor-In-Possession [Docket No. 16] and this declaration, neither the firm nor any of its members have any connection with Hidden Glen, LLC, the above-named debtor, its creditors, the U.S. Trustee or any other party in interest herein, or their respective attorneys or accountants, and

1 represents no interest adverse to the estate in the matters upon which it is to be retained, except
2 that the firm represents said Debtor in this case.

3 4. As of the petition date, your Applicant holds a pre-petition retainer in the amount of
4 \$19,833 which, if authorized, your Applicant will draw down to pay fees and costs as they are
5 incurred, with said fees and costs subject to approval of the Bankruptcy Court. Your Applicant
6 received a pre-petition retainer of \$23,283, plus the filing fee of \$1,717. Your applicant drew
7 down on the retainer pre-petition and fees and cost owed at that time leaving the balance listed
8 above. The retainer was paid directly by the Debtor and the funds used to the pay the retainer
9 were from a \$25,000 secured loan made by Lois Mowat, an existing secured creditor of the
10 Debtor.

11 5. To the best of my knowledge, the Debtor's application sets forth all of the
12 applicant's connections with the debtor, creditors, any other party in interest, their respective
13 attorneys and accountants, the United States Trustee, or any person employed in the Office of the
14 United States Trustee.

15 I declare under penalty of perjury that the foregoing is true and correct and that this
16 declaration was executed this 20th day of November, 2020 at Oakland, California.

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18 /s/ Chris D. Kuhner
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